

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America
v.
Kah'Lil Kiree Lamonte Wade
4460 Keeler Drive,
Columbus, Ohio 43227

Defendant

Case No. 2:23-mj-257

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 12/20/2022 in the county of Franklin in the Southern District of Ohio, the defendant violated 18/21 U. S. C. § 922 / 843, an offense described as follows:

18 U.S.C. § 922(g)(1) - Unlawful possession of a firearm or ammunition by a prohibited person.

21 U.S.C. § 843(a)(6) - Unlawful for any person knowingly or intentionally to possess any three-neck round-bottom flask, tableting machine, encapsulating machine, or gelatin capsule, or any equipment, chemical, product, or material which may be used to manufacture a controlled substance or listed chemical.

This criminal complaint is based on these facts:

SEE AFFIDAVIT ATTACHED HERETO AND INCORPORATED BY REFERENCE HEREIN.

☒ Continued on the attached sheet.

JUSTIN B
MYERS

Digitally signed by
JUSTIN B MYERS
Date: 2023.04.14
12:29:39 -04'00'

Complainant's signature

Justin Myers, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/14/2023

City and state: Columbus, Ohio

Kimberly A. Johnson
United States Magistrate Judge



**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Homeland Security Investigations (HSI) Columbus, Ohio Special Agent (SA) Justin Myers, being first duly sworn, hereby depose and state as follows:

1. I make this affidavit in support of a criminal complaint to arrest Kah'Lil Kiree Lamonte WADE for violations of 18 U.S.C. § 922(g)(1) - unlawful possession of a firearm or ammunition by a prohibited person and 21 U.S.C. § 843(a)(6) - unlawful for any person knowingly or intentionally to possess any three-neck round-bottom flask, tableting machine, encapsulating machine, or gelatin capsule, or any equipment, chemical, product, or material which may be used to manufacture a controlled substance or listed chemical. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I did not include each and every fact known concerning this investigation. I did not withhold any information or evidence that would negate probable cause. I set forth only the facts that are believed to be necessary to establish probable cause that WADE committed the violations listed above.

2. I have been employed by HSI since June 2004. I gained experience through a bachelor's degree in Criminology, a master's degree in Forensic Science, completion of the Federal Criminal Investigator Training Program, and completion of the HSI Academy. During that training, I was instructed in all phases of criminal investigation such as: criminal law, search and seizure, field enforcement techniques, firearms proficiency, and interviewing and evidence. I have also completed the HSI Cyber Undercover Training Course and the HSI Advanced Cryptocurrency and Darknet Training Course. I am responsible for enforcing federal criminal statutes involving, but not limited to, firearms and controlled substance violations, pursuant to 18 U.S.C. § 922 and 21 U.S.C. § 843.

3. The information set forth in this affidavit is based upon seized evidence and my observations and experiences, as well as those of co-workers and counterparts from participating agencies.

Facts Supporting Probable Cause

4. On October 24, 2022, United States Customs and Border Protection (CBP) selected an international parcel (FedEx # 27909845570) for examination that was inbound into the United States from the country of China. The parcel was scheduled to be delivered to “Kwade” at 4460 Keeler Drive, Columbus, Ohio 43227, which is in the Southern District of Ohio. The contents of the parcel were manifested as “SCREW” with a declared value of \$50.00.

5. Upon examination and a physical inventory of the contents of the parcel, CBP determined the contents to contain one pill press die set (upper and lower punch with receiving die). The die set contained markings consisting of a logo of square box with a letter “M” inside of the box and the number “30”. CBP seized the contents pursuant to 19 U.S.C. § 1595a(c)(2)(A), 21 U.S.C. § 863(a)(3), and 21 U.S.C. § 863(d). The evidence was turned over to HSI for further investigation.

6. State of Ohio databases identified Kah’Lil Kiree Lamonte WADE as a current resident at 4460 Keeler Drive. The seized parcel was scheduled to be delivered to “Kwade” at that residence, which is consistent with the name Kah’Lil Kiree Lamonte WADE.

7. Department of Homeland Security databases listed a previous international parcel from China that was scheduled to be delivered to Ashley MCNEIL at 4460 Keeler Drive. The parcel entered the United States on February 26, 2022. The parcel was manifested as a “PRESS MACHINE.” CBP did not inspect the parcel. The parcel was not seized. CBP released the parcel to United States Mails for delivery to the scheduled recipient. I know that past international parcels seized by CBP manifested as “PRESS MACHINE” have either contained a full pill press or pill press parts. I also know that ordering a pill press or pill press parts and the subsequent pill press die set is consistent with somebody that is currently producing, or attempting to produce, pills.

8. State of Ohio databases listed WADE and MCNEIL as residing together at previous addresses, along as at 4460 Keeler Drive. Investigators determined MCNEIL to be WADE's former girlfriend. They no longer reside together.

9. WADE is restricted from possessing a firearm due to his criminal convictions. State of Ohio and federal databases list WADE's criminal convictions from the years 2015-2022 as: theft (felony 3), possession of a controlled substance (misdemeanor 1), discharge firearm on/near prohibited premises (felony 3), attempted burglary (felony 3), possession of drugs (misdemeanor 1), and criminal mischief (misdemeanor 3). All of the criminal convictions listed above are associated with violations of the Ohio Revised Code (ORC).

10. The Drug Enforcement Administration's (DEA) Tactical Diversion Squad (TDS) in Columbus, Ohio identified the markings on the seized pill press die set as markings consistent with a 30mg oxycodone pill made by the company Mallinckrodt Pharmaceuticals. The TDS stated the seized pill press die set appears to be counterfeit and that the markings placed on the die set are slightly different than a legitimate die set. The TDS also stated that WADE nor MCNEIL have reported the importation and operation of a pill press to the DEA as required under 21 U.S.C. § 1310.05.

11. On December 02, 2022, WADE was arrested at the Hollywood Casino in Columbus on a state felony warrant for receiving stolen property in violation of ORC 2913.51(A). At the time arrest, WADE had a bag on his person containing approximately 46.3 grams of Marijuana (Schedule I controlled substance) and a bag containing 28 pills. The pills were rectangle in shape and green in color. Each pill contained the marking "S 90 3". That marking is associated with the drug Alprazolam (Xanax). The pills were sent to the Ohio Bureau of Criminal Investigation (BCI) Forensic Laboratory for analysis. The BCI Forensic Laboratory confirmed twenty three (23) pills contained 7.34 grams of 6-(4-chlorophenyl)-1-methyl-4H-[1,2,4]triazolo[4,3-a][1,4]benzodiazepine (4'-chloro Deschloroalprazolam) and five (5) pills contained Bromazolam. Both substances under Ohio Administrative Code 4729:9-1-01(E)(5) are controlled as

benzodiazepine pharmacophores, which are Schedule I depressants in the State of Ohio. The substances found in the pills are not federally scheduled.

12. On December 05, 2022, I obtained a federal search warrant through the U.S. District Court in the Southern District of Ohio (case # 2:22-MJ-766) to place a Global Positioning Device in/on his gray 2006 BMW X5 bearing State of Ohio plate GIM8325. Electronic surveillance showed the vehicle located at numerous motels/hotels and apartment complexes for short durations on multiple occasions. That activity was consistent with the distribution of controlled substances.

13. On December 19, 2022, I obtained a federal search warrant through the U.S. District Court in the Southern District of Ohio (case # 2:22-MJ-798) to search WADE's residence of 4460 Keeler Drive. HSI Columbus, along with the DEA, executed the warrant at 4460 Keeler Drive on December 20, 2022. WADE was home at the time. I advised WADE of his Miranda Warnings, which he waived in writing. He admitted to receiving a pill press through U.S. Mails but stated that his girlfriend MCNEIL was not involved. At that point WADE declined to answer any additional questions. In turn, I terminated the interview. HSI seized the following items from 4460 Keeler Drive: a Glock 26 9mm pistol (S/N: AFSF141) with a loaded extended magazine and a loaded standard magazine; a Bushmaster XM15-E2S AR-15 (S/N: L246703); a Hawk Industries Company H&R 1871 12-gauge shotgun (S/N: NZ615251); additional rounds of 9mm ammunition, a complete set of ballistic body armor; a full manual non-branded pill press; one kilogram of pill binding agent (baby blue for M30 pills); a grinder being used with the pill press to mix powders; numerous doses of Suboxone; and approximately 337 grams of marijuana. The loaded extended magazine was inserted into the Glock 26 pistol. The chamber to the pistol did not contain a round. All three firearms and their associated magazines were taken to the Columbus Division of Police (CPD) Crime Laboratory for Deoxyribonucleic Acid (DNA) testing.

14. The loaded Glock 26 9mm pistol was found lying on the top of a cabinet in the kitchen to the residence, which is approximately seven feet from the kitchen floor. There was a hole in the wall next to the firearm from what appeared to be an accidental discharge from a

previous occasion. Due to the height of where the firearm was found, a person would either need to be tall enough to reach the firearm or would have to use a step ladder to retrieve it. WADE is 6 foot 6 inches tall, making him tall enough to reach the firearm.

15. Patricia Burk, the owner of 4460 Keeler Drive, arrived home shortly before the completion of the search warrant. Ms. Burk stated that she and WADE were the only individuals residing at 4460 Keeler Drive. Ms. Burk also stated she does not own any firearms and was unaware that there were any firearms in the residence.

16. On December 22, 2022, I obtained a federal search warrant through the U.S. District Court in the Southern District of Ohio (case # 2:22-MJ-807) to obtain a saliva sample from WADE for purposes of comparing WADE's DNA to any DNA found on the firearms that were seized from his residence. I executed the warrant on December 23, 2022. WADE was incarcerated at the Franklin County, Ohio Jail on state charges for burglary at the time the warrant was executed. The saliva sample from WADE was seized by HSI and turned over to the CPD Crime Laboratory for comparison to any DNA recovered from the seized firearms.

17. The CPD Crime Laboratory provided HSI with the results from the DNA testing pertaining to the three firearms and associated magazines seized from WADE's residence. The Glock 26 9mm pistol (S/N: AFSF141) and the inserted extended magazine contained DNA that was consistent with the DNA profile of WADE. Based on these results, it is at least 435 octillion times more likely if the evidentiary profile originated from WADE than if it originated from an unknown, unrelated individual. This analysis provides support that WADE is the contributor of this profile. The Bushmaster XM15-E2S AR-15 (S/N: L246703) contained DNA interpreted as being a mixture of three individuals. WADE cannot be excluded as the major contributor of this profile. Based on these results, it is at least 225 octillion times more likely if WADE is a contributor than if this were a mixture of three unknown, unrelated individuals. This analysis provides support WADE is a contributor to this profile. The data from the minor second and third contributors is not of sufficient quantity and /or quality; therefore, no comparisons and no CODIS (Combined DNA Index System) entry can be made for these contributors. The additional Glock 26 magazine found in the residence contained DNA interpreted as being a mixture of two

individuals. WADE cannot be excluded as the major contributor of this profile. Based on these results, it is at least 851 septillion times more likely if WADE is a contributor than if this were a mixture of two unknown, unrelated individuals. This analysis provides support that WADE is a contributor to this profile. The data from the minor second contributor is not of sufficient quantity and /or quality; therefore, no comparisons and no CODIS entry can be made for this contributor. No DNA profile was found on the Hawk Industries Company H&R 1871 12-gauge shotgun (S/N: NZ615251).

18. On April 12, 2023, the Columbus Bureau of Alcohol, Tobacco, and Firearms confirmed that all three firearms seized from WADE's residence were made outside of the State of Ohio. Therefore, all three firearms traveled through interstate commerce before being seized from WADE's residence.

19. Based on investigative efforts to date, I believe the firearms found in the TARGET RESIDENCE and subsequently seized during the execution of the search warrant belong to WADE and will contain his DNA. I further believe WADE was using the firearms to protect his unlawful controlled substance pill producing operation.

Conclusion

20. Based upon all the above facts, WADE purchased and received a pill press and dye set on approximately February 26, 2022, that traveled through foreign and U.S. Mails from an international location to the State of Ohio. That pill press and dye set was seized during the execution of the search warrant on WADE's residence. WADE is not authorized by the DEA to operate a pill press. On approximately October 24, 2022, WADE purchased a second pill press dye set from the country of China containing the "M30" logo with the intent to press counterfeit oxycodone pills. CBP seized that pill press dye set before it was delivered to WADE. HSI seized approximately one kilogram of blue pill binding agent which is commonly used to assist with manufacturing "M30" oxycodone pills, as they are blue in color. DNA evidence obtained through a saliva sample from WADE and DNA evidence found on firearms seized from WADE's residence confirm WADE was in possession of firearms. He is restricted by law from possessing a firearm.

21. Based upon the above information, I believe there is probable cause to believe WADE committed violations of 18 U.S.C. § 922(g)(1) - unlawful possession of a firearm or ammunition by a prohibited person, and 21 U.S.C. § 843(a)(6) - unlawful for any person knowingly or intentionally to possess any three-neck round-bottom flask, tableting machine, encapsulating machine, or gelatin capsule, or any equipment, chemical, product, or material which may be used to manufacture a controlled substance or listed chemical. Therefore, I respectfully request that this Court issue an arrest warrant.

**JUSTIN
B MYERS** Digitally signed by
JUSTIN B MYERS
Date: 2023.04.14
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Justin Myers

Special Agent

Homeland Security Investigations

Sworn and subscribed to before me this 14th day of April 2023.



Kimberly A. Johnson
United States Magistrate Judge

